



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

OCT 11 2000

Alco Poitevint, Treasurer  
Republican National Committee - RNC  
310 First Street, S.E.  
Washington, DC 20003

Identification Number: C00003418

Reference: May Monthly Report (4/01/00-4/30/00)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 of your report discloses \$1,046,166.21 from your "Republican National State Election Committee" non-federal account. The sum of the entries on memo Schedule B for Line 2 of Schedule I, however, indicates the total to be \$969,724.21. Please clarify this discrepancy.

-Memo Schedule B supporting Line 2 of Schedule I of your committee's "RNSEC - Administrative Account" discloses \$75,000 in transfers to your federal account. However, this transfer has not been disclosed on Schedule H3 of your report. Please clarify this discrepancy.

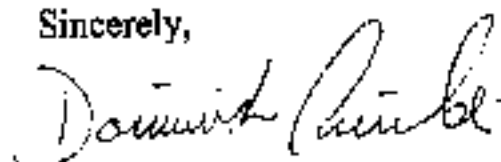
-In accordance with 11 CFR 104.8(e), a National Party Committee shall disclose in a memo Schedule A, information about each individual, committee, corporation, labor organization, or other entity that donates in excess of \$200 in a calendar year to the committee's non-federal account(s). Furthermore, in accordance with 11 CFR 104.9(c), a National Party Committee shall report in a memo Schedule B the full name and mailing address of each person to whom a disbursement in an aggregate amount or value in excess of \$200 within the calendar year is made from the committee's non-federal account(s), together with the date, amount and purpose of such disbursement.

Advisory Opinion 1992-33 discloses alternative methods for reporting the receipt of these contributions on the Committee's I Schedules. The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. **In addition, in order to reflect the fact that the reported in-kind donations have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1.** Alternatively, the committee may include the total amount of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your reports to accurately disclose the non-federal in-kind contributions in accordance with one of the methods described above.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

